

# Dignity at work policy

Last reviewed and approved on 27 November 2024



**NASPERS**

## Dignity at work policy

### 1. INTRODUCTION

*“We strive to have a workplace where teamwork and mutual trust are promoted and where employees are treated with dignity and respect.”*

Workplace harassment can have a serious and damaging impact on those who experience it. This policy sets out our zero-tolerance approach to any form of workplace harassment (including sexual harassment and bullying) (“**Harassment**”). It also provides details on what to do if you have concerns that you have been subjected to this kind of behaviour in the workplace or a work-related situation. This policy applies to everyone who works at the Naspers Group level including Prosus N.V. (**Prosus**).

### 2. CORE COMMITMENTS

- We are committed to providing a respectful, safe and secure environment that is free from all forms of Harassment, and we expect everyone to behave and act in a way that is consistent with this commitment.
- We have zero-tolerance for any kind of Harassment, and we will treat all allegations and complaints seriously.
- We make sure that any complaint raised will be investigated carefully, and with appropriate confidentiality. Any person who has experienced Harassment will be supported.
- Any person found to be guilty of Harassment will face appropriate disciplinary action, up to and including dismissal.
- In case of a criminal offence, we encourage the victim immediately to report the incident to local authorities or to the police.
- In alignment with our ethics and compliance policy, implement training to educate staff about speaking up to create an equitable and inclusive workplace.

### 3. POLICY SCOPE

This policy applies to all people who work in Naspers Group roles including temporary and permanent employees, contractors, consultants, trainees and / or job applicants. (Where an individual is legally employed by an operating company, this policy applies alongside any similar local policies that may be in place.)

This policy applies in all work locations and in all situations directly related to work. These include all premises Naspers, Prosus and those of subsidiary companies, company-sponsored events (including sponsored social events), business trips, training sessions and conferences or other events sponsored by Naspers, Prosus or attended by Naspers Group employees.

### 4. WE DO THE RIGHT THING

We apply the following fundamental principles:

- We do not tolerate Harassment in the workplace or situations directly related to work. This includes Harassment related to gender, gender identity, gender expression, transgender status, sexual stereotypes, sexual orientation, class, race, religion, creed, colour, marital or family status, age, nationality, political association or disability.
- We treat others with the respect that we ourselves would like to receive.
- We are not afraid to speak out: if we see or experience conduct that is Harassment then we are encouraged to report this in the appropriate way.

## 5. WHAT IS HARASSMENT?

- Harassment is any conduct (whether direct or indirect, whether verbal, physical or otherwise) which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading or offensive environment. (Accordingly, conduct may violate this policy even if it is not illegal under the law that applies.)
- For example, Harassment may include the following types of conduct. This list of examples is not exhaustive, and other behaviours may constitute Harassment under this policy:
  - ridiculing, derogatory or demeaning teasing, jokes, pranks or comments;
  - inappropriate non-verbal behaviour such as staring, leering, or gestures;
  - intentionally and inappropriately excluding someone from normal workplace interactions;
  - displaying or sharing offensive images; or
  - offensive comments about appearance, or other personal or physical characteristics, such as sexually charged comments or comments on someone's physical disability.
- Harassment includes sexual harassment which is Harassment based on sex. This includes any form of inappropriate and unwelcome conduct of a sexual nature that violates a person's psychological or physical dignity. Examples of behaviour that constitutes sexual harassment include, but are not limited to:
  - displaying or sharing offensive sexual images;
  - inappropriate sexual advances or sexual advances in circumstances where it has been made clear that such advances are not welcome or are not reciprocated;
  - unnecessary or unwelcome physical contact such as groping or massaging, blocking normal movement, or physically interfering with the work of another individual; or
  - threats or demands that a person submit to sexual requests as a condition of continued employment and offers of employment-related benefits in return for sexual favours.
- Harassment also includes abusive, bullying or aggressive behavior which undermines an individual's right to dignity at work. Harassment does not include:
  - day to day pleasantries or cross-cultural misunderstandings except where such behaviour is repeated after it has been highlighted as inappropriate; and
  - a negative performance review or discussions about poor performance. (We recognise that we need to be able to have direct and robust discussions about performance. These sorts of discussions may be experienced as unpleasant but, as long as they are respectful, they are not Harassment.)

## 6. MAKING AN INTERNAL COMPLAINT

- If you believe you have experienced any kind of Harassment, you may, at any time, talk to your supervisor, manager or Human Resources team to seek initial advice, information or guidance.
- If you want to make a formal complaint, you can make this to your supervisor, manager or human resources team.
- Supervisors, managers and members of the human resources team will act expeditiously and fairly in response to all allegations of Harassment.
- When possible, a complaint should include details of the incident or incidents, names of individuals involved, and names of any witnesses.

## 7. PRINCIPLES FOR INTERNAL COMPLAINTS

- All formal complaints will be investigated, carefully, discretely and promptly.

- All complaints will be kept strictly confidential to the extent that we are able to do so while still fulfilling our commitment to investigate and to end any Harassment.
- Regardless the outcome of an investigation, any individual who has made a complaint in good faith will be protected from any form of retaliation for making such complaint.
- We will not ignore a complaint that has been made in good faith.
- Allegations of Harassment are extremely serious. This means that we will take appropriate disciplinary action, up to and including dismissal, against anyone who makes a complaint other than in good faith.
- If we determine that a person's conduct has violated this policy, we will take steps to ensure the conduct is addressed, and any person found to have engaged in Harassment may be subject to disciplinary action, up to and including dismissal.
- When we determine whether conduct has violated this policy, we will consider whether a reasonable person would conclude that the conduct created an intimidating, hostile, degrading or offensive environment.

#### **8. MAKING AN EXTERNAL COMPLAINT**

- If you believe that there has been a breach of this Policy, we encourage you to Speak Up. You may, at any time, contact your line manager, HR, an Ethics & Compliance Officer or the Naspers Group Ethics & Compliance team ([speakup@naspers.com](mailto:speakup@naspers.com)) to seek advice, guidance or to formally raise a concern.
- If you do not feel comfortable raising a concern internally, you may use the independent, external Speak Up Service operated by Navex Global EthicsPoint. There are two ways to report a concern using the Speak Up Service:
  - Online: <https://speakup.naspers.com>
  - Telephone: (numbers available on website above)

#### **9. MONITORING AND REPORTING**

The Board oversees and is ultimately responsible for ensuring all employees are treated with dignity and respect. The Social, Ethics and Sustainability Committee and the Human Resources and Remuneration Committee assist the Board in discharging its responsibility in relation to this policy. This ensures our commitment to ethical governance and a fair and inclusive workplace.

Group HR along with Group Ethics and Compliance, in alignment with the Speak Up policy will monitor the design, implementation, adequacy and effectiveness of the policy across the group, with reports provided to the appropriate board committees.